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JUN 16 1992

Dave Freise
Hazardous Waste Program
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102

RE: Comments on the Draft Preliminary Assessment for Modine
Heat Transfer, Camdenton, Missouri
EPA I.D. #MOD062439351

Dear Mr. Freise:

The Environmental Protection Agency, Region VII (EPA) has reviewed the April 7, 1992, draft Preliminary Assessment submitted by the Jacobs Engineering Group, Inc. (Jacobs) for the above-referenced facility. The following are EPA's comments on the draft report:

1. Table of Contents: Section 3.2, Potential Surface Water Receptors, is incorrectly listed as being on page 6 and should be changed to page 5. Section 3.7, Population/Census Information, should be listed as being on page 9.
2. Provide the Summary of Recommendations as a document separate from the report.
3. Table of Contents: List the Figures before the Tables in the Table of Contents as this is the order in which they are presented in the report.
4. Table of Contents, Figures: Figures 5 a & b are listed in the Table of Contents; however, there is only one Figure 5 included in the report.
5. Page ES-1, second paragraph, sixth sentence: Why are the spent solvents listed as a non-hazardous wastestream?
6. Page ES-2, first paragraph, first sentence: Several solid waste management units (SWMUs) are inaccurately identified in this sentence as being inactive. The correct list of inactive SWMUs is as follows: #1, #2, #6, #7, #14, #17, #19, and #21.
7. Page 1, section 1.2, second bullet: Provide a detailed site base map to scale as requested in the Scope of Work.

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8. Page 1, section 2.1, second sentence: This sentence states "The facility is on the west end of the street." Figure 1 indicates the facility to be located on the west end of Mulberry Lane and south of Sunset Drive. Clarify this.

9. Page 2, section 2.2, third sentence: This sentence states "The facility occupies approximately 100 acres of Section 26, Township 38 North, Range 17 West." The information provided in the last sentence of section 2.1 states that the facility is located in section 25. Which is the correct location of this facility? Does 100 acres describe the size of the entire facility?

10. Page 2, section 2.2, seventh sentence: This sentence states "The site is secured with a chain-line fence." This information conflicts with information presented on Figure 4 which shows only the area around the manufacturing building to be enclosed by a fence.

11. Page 2, section 2.3: Include a brief statement describing the nature of operations of Dawson Metal Products, if known.

12. Page 2, section 2.3, fourth sentence: The correct name of this facility is Modine Heat Transfer, Inc., not Modine Heat and Transfer, Inc. as this sentence states.

13. Page 2, section 2.4, first paragraph, second sentence: Change this sentence to state: "Manufacturing processes, the wastes generated, and the associated SWMUs are discussed below."

14. Page 2, section 2.4, second paragraph, first sentence: This sentence states: "MHT is a manufacturer of aluminum and copper coils and feeder parts." This is the fourth time in as many pages that this sentence appears. A more informative statement would be "MHT is a manufacturing facility that produces air conditioning coils and feeder parts from aluminum and copper tubing."

15. Page 3, fourth paragraph, last sentence: Complete this information by stating where TCE was stored from 1983 to 1990.

16. Page 3, Waste 1,1,1-Trichloroethylene (TCE) Still Bottoms, first sentence: "Decreasing operation" should read "degreasing operation."

17. Page 3, Waste 1,1,1-Trichloroethylene (TCE) Still Bottoms, second to last sentence: Change "M85" to "M185" and put "new" in parentheses.

18. Page 3, Waste 1,1,1-Trichloroethylene (TCE) Still Bottoms: The information presented in this paragraph indicates that only TCE still bottoms were managed at the facility. Throughout the

report, spent TCE is referenced as a waste managed as well as the TCE still bottoms. Clarify this.

19. Page 3, wastestreams associated with past activities listed on the original 1980 Part A application: The numbers given for the generation rate of each waste are identical to the numbers on the original Part A application; however, the units on the Part A are pounds per year and in the report are given as pounds per month. Clarify this.

20. Page 3, last paragraph, first sentence: The correct name of the company that owned the facility from 1974 to 1986 is Sundstrand Tubular Products.

21. Page 4, first full paragraph, third sentence: This is essentially the same paragraph as is presented on page 3 except that in the page 4 version, storage tank number 6 (SWMU #9) is mentioned as a location where TCE waste was containerized and the SWMU locations where TCE was stored from the early 1970s to 1983 are different. Clarify the information and try to avoid redundancy.

22. Page 4, last paragraph, third and fourth sentences: Change "plant" to "manufacturing building" in these sentences.

23. Page 4, last paragraph, fourth and fifth sentences: These sentences are confusing. For example, in the fourth sentence, is SWMU #21 being referred to as the 1983 building addition, area 1, or is SWMU #21 merely referenced because of its proximity to the area under investigation? Restate this information.

24. Page 5, section 3.1, third sentence: The name of this street as shown on Figure 1 is Mulberry Lane. Use the correct name consistently throughout the report.

25. Page 5, section 3.1: Several wells, which are located close to the facility, are discussed in this section. Provide the well logs for the wells located closest to the facility as an appendix to the report.

26. Page 6, section 3.3, second paragraph, second sentence: This sentence does not make sense.

27. Page 7, second full paragraph, second bullet: "Residual" should be changed to "residuum."

28. Page 8, section 3.4, second paragraph, first sentence: This sentence describes the city of Camdenton well number 6 as being located 700-feet east of the facility. The third sentence in section 3.1 on page 5 describes this well as being southeast of the facility. Figure 1 shows this well to be located south of the facility. Clarify this.

29. Page 9, section 4.0, second paragraph: Add "with" before intermittent showers.

30. Page 10, section 4.2, third sentence: Add "respectively" at the end of this sentence.

31. Page 10, section 4.2, fourth sentence: Change "will be" to "are."

32. Page 13, SWMU Description, first paragraph: This SWMU does not include the entire 1985 addition to the manufacturing building and its contents. Rewrite this section and describe the physical characteristics of the SWMU and the location of the SWMU. Including the pretreatment reference in the SWMU name is confusing as SWMU #4 is the pretreatment wastewater system/filter press. Is this really necessary?

33. Page 13, Release Controls, second sentence: What is the chemical-resistant coating that is mentioned in this sentence? When was it applied to the floor? According to photographs submitted by the facility to EPA, the floor in this drum storage area slopes to a drain sump. Was this evident during the visual site inspection (VSI)? If this sump exists, how is it emptied?

34. Page 14, SWMU Description: On Figure 7, this SWMU is labeled as the Wastewater Treatment System. Be consistent in the use of SWMU and AOC names.

35. Page 14, SWMU Description, second paragraph, second sentence: The correct name for AOC F is the tool crib/maintenance area. Be consistent in the use of SWMU and AOC names.

36. Page 15, Release Controls, third sentence: Information previously presented in the report indicated that the curbed area was designed to hold 110 percent of the largest tank in the room. Clarify this.

37. Page 15, Migration Pathways: Air is listed twice as a migration pathway.

38. Page 16, Release History, third sentence: Indicate that spent solvent was the material spilled.

39. Page 16, Release History, last sentence: The information presented in the sentence is incorrect. Trans-1,2, Dichloroethene was not detected in soil boring B-3, but in soil boring B-4. Also, soil boring B-3 represented a depth of 2-4 feet, not 4-8 feet as this sentence states. Also, what is the point of narrating the analytical results of one soil boring and not the other?

40. Page 17, SWMU Name: This SWMU is labeled as the "Drum Storage Area" on Figure 7. Be consistent in the use of SWMU and AOC names.

41. Page 18, SWMU Number 8: See above comments regarding consistent use of SWMU and AOC names.

42. Page 19, Release Controls and Release History: The name of the SWMU, referenced in these sections, should be changed to the "Tank and Drum Storage Area Number 2."

43. Page 20, SWMU Description, second sentence: The Waste FIN Oil Tank Number 5, referred to in this sentence, is a SWMU and should be addressed as such in the report.

44. Page 20, Wastes Managed, first sentence: See comments regarding consistent use of SWMU and AOC names.

45. Page 20, Wastes Managed, second sentence: M487 also receives waste TCA still bottoms from Vapor Degreaser and Still M185 (New).

46. Page 20, Wastes Managed, third sentence: Delete "gal."

47. Page 20, Wastes Managed: Indicate how this waste is managed when it leaves this SWMU.

48. Page 21, SWMU Description: Describe the physical characteristics of this SWMU such as the material of construction and volume of the baths.

49. Page 21, SWMU Description, first sentence: The Copper Cleaning Line is located northwest of the copper brazing area according to Figure 7, not northeast as this sentence states.

50. Page 22, SWMU Description: Describe the physical characteristics of this SWMU such as the material of construction and volume of the baths.

51. Page 22, Wastes Managed, first sentence: The SWMU being discussed on this page is the Aluminum Cleaning Line, not the Copper Cleaning Line as this sentence states.

52. Page 23, SWMU Description: Describe the physical characteristics of this SWMU such as the material of construction and volume of the baths.

53. Page 23, Wastes Managed: Specifically identify what wastes are or have been managed at this SWMU.

54. Page 24, Dates of Operation, first paragraph, second to the last sentence: Identify the TCA Storage Tank Number 6 as SWMU #9.

55. Page 24, Dates of Operation: Much of the information presented in the first paragraph of this section should be in the SWMU Description. The second and third sentences of the second paragraph of this section belong in the Release History section. This type of information (observations made during the VSI regarding spill areas, cracks in the floor, the condition of the unit, etc.) should be included in the Release History of every SWMU and AOC in this report.

56. Page 25, SWMU Description, second sentence: Figure 7 shows SWMU #14 as the Former Vapor Degreaser not the Vapor Degreaser and Still M185 (Former). Correct this.

57. Page 25: The discussion of SWMU #14 on this page alternates between past and present tense. Correct this.

58. Page 25, Wastes Managed: Provide information as to where the spent TCE was managed after it left this SWMU. Also, if this SWMU was not present after 1972, it was not spent TCA that was managed in this unit as the second sentence states, but spent TCE. The Vapor Degreaser and Still M487 was not installed at the time this SWMU was present, as the last sentence states. Correct this.

59. Indicate, in the SWMU Description section for all of the Vapor Degreaser and Still Units, if the unit is located in a pit.

60. Page 26, SWMU Description, third sentence: SWMU #15 is shown on Figure 7 once, and is labeled as the Former Vapor Degreaser.

61. Page 26, Dates of Operation, second sentence: Use the correct name for the Vapor Degreaser and Still Unit M185 (Former) and identify the SWMU number. Also, this sentence states that the Vapor Degreaser and Still Unit M185 (Former) was in operation from November 1973 to 1976. The last sentence of this paragraph contradicts this statement as does the discussion on the previous page which states that the Vapor Degreaser and Still Unit M185 (Former) was destroyed by fire in 1972. Correct this inconsistency.

62. Page 27, SWMU Description, second paragraph, sixth sentence: "Numbers moved" does not make sense. Also, the Chemical Storage area is not SWMU #4.

63. Page 27, Wastes Managed, first sentence: How was spent TCE managed in this unit from 1973 to 1990 if it was not installed until 1982?

64. Page 27, Release History, first sentence: The correct name of this SWMU is the Vapor Degreaser and Still M487.
65. Page 28, SWMU Description: Include information on the physical characteristics of this SWMU.
66. Page 28, Release History, first sentence: The correct name of this SWMU is the Vapor Degreaser and Still M460 (Former) not the M460 (Former) degreaser and still as stated in this sentence.
67. Page 28, Release History, second sentence: If this unit was dismantled in 1987, it did not manage TCA waste.
68. Page 29, Wastes Managed, first sentence: This unit managed waste TCE from 1987 to December 1990.
69. Page 30, SWMU Description: Provide information on the physical description of this SWMU. This paragraph only describes the historical locations of this SWMU. This same information regarding the historical locations is then repeated in the Dates of Operation section.
70. Page 31, SWMU Description, first sentence: The location of SWMU #20 is depicted as directly west of SWMU #18, not directly north as this sentence states.
71. Page 31, SWMU Description, last sentence: Change "are" to "is."
72. Page 31, SWMU Description, second paragraph, third sentence: Indicate that the Vapor Degreaser and Still M567 is SWMU #18.
73. Page 31, Photograph 17: Two 2,000-gallon tanks are not visible in this photograph. Is this the correct photograph for this SWMU?
74. Page 32, SWMU Description, second paragraph, second sentence: This sentence states: The storage area consisting of a base rock pad on a gravel clay mixture was poured onto a base rock and clay mixture." In the release controls section a cement slab on a base rock and clay mixture is described. State clearly, in the SWMU Description, what materials make up this SWMU.
75. Page 32, Release History, first sentence: What is the reference for the information presented in this sentence?
76. Page 32, Release History, second paragraph, first sentence: Indicate the SWMU number correlating with the degreasing machine pit.

77. Page 33, SWMU Description, second paragraph, last sentence: Change the name of this SWMU, on Figure 7, from "Dumpsters" to "Non-Hazardous Waste Receptacle."

78. Page 34, SWMU Description, third sentence: Change "are" to "is."

79. Table 2, Area #1 - SWMU #21: The depth of the borings at sample locations HA-4 and HA-5 should be 0 - 0.75 feet and 0 - 2.0 feet, respectively. The following changes should be made to the analytical data reported for sample HA-5: The analytical result for 1,1-Dichloroethene is ND, not 72 ug/kg; 1,1-Dichloroethane (which is not listed on the Table) was detected in sample HA-5 at 72 ug/kg; Tetrachloroethene should be 130 ug/kg, not 30 ug/kg. 1,2-Dichloroethene was not a constituent included in the analysis and it can be removed from this table. In its place add 1,2-Dichloroethane and indicate that this constituent was found at 420 ug/kg in sample HA-5.

80. Areas of Concern A, B, C, and D appear to be located close together and within the same secondary containment area. Incorporate the information for all of these areas of concern into one area of concern. Also, change "wastes managed" to "materials managed."

81. Page 39, AOC E: Are these pallets being stored or are they abandoned or discarded and awaiting disposal? If the latter, identify this area as a SWMU. Indicate if this area is constructed of concrete or if the pallets are placed directly on the ground.

82. Page 40, AOC Description, first sentence: The Tool Crib/Maintenance Area, according to Figure 7, is located southeast of the copper brazing area, not west as this sentence states.

83. Page 41, AOC G: Is there a SWMU located in this area where the paint wastes are managed? If so, include this SWMU in the report.

84. The following comments apply to Table 1:

a. SWMU #4 and #5: Pretreatment filter storage is not a waste.

b. SWMU #7: Change the name of this SWMU to Tank and Drum Storage Area #2.

c. SWMU #8: According to the information presented in the text, TCE was never managed at this SWMU.

d. SWMU #8A: Include SWMU #8A in this Table.

e. SWMU #10, #11, #12: State what the wastes are at the time they are being managed in these SWMUs, not after they are treated in the wastewater system.

f. SWMU #15: SWMU #15 began operating in 1976, not 1973.

g. SWMU #16: The name of this SWMU should be changed to Vapor Degreaser and Still M487. Also, the wastes managed at this SWMU are TCE and TCA.

h. SWMU #17 and #19: Delete one of the TCE's from the wastes managed.

i. SWMU #18 and #20: Change one of the TCE's to TCA.

j. SWMU #21: According to the text, TCA was not used at this facility until 1990, therefore it should be deleted from the waste managed at SWMU #21.

k. AOC's: No wastes are being managed at these areas.

l. Check the wastes managed, as reported in this table, with those wastes reported in the text and make sure they are consistent.

85. Historical waste management practices for the Vapor Degreasers and Stills have not been adequately addressed in this report. Information is required, not only on active SWMUs, but also on inactive SWMUs. According to the text, there are a total of eleven locations where TCE or TCA has been managed in a vapor degreaser and still. These areas will have to be identified as SWMUs in the report. This should also reduce the confusion that results when attempting to track the various locations where a piece of mechanical equipment has operated historically. Also, currently Vapor Degreaser and Still M487 accepts waste TCA from Vapor Degreaser and Still M185, M587, and M184. Vapor Degreaser and Still M487 was installed at the facility in 1982. How was waste TCE managed prior to the installation of Vapor Degreaser and Still M487?

86. Much of the information provided in this report does not have a reference citation. Correct this.

I have enclosed a diskette holding a copy of this letter so that these comments can be easily incorporated into MDNR's comments in a letter to Jacobs. If you have any questions regarding these comments, please contact me at (913) 551-7544.

Sincerely,

Diane Huffman, Geologist
RCRA Compliance Section

cc: Pat Nichols, PRMT